

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PLAINTIFF'S CIVIL ACTION No. 04-10956-REK

ERNEST OGLETREE, Plaintiff)	UNITED STATES DISTRICT COURT
)	MASSACHUSETTS, MASS.
v.)	PLAINTIFF'S MANDATORY
)	<u>DISCLOSURES</u>
CITY OF ATTLEBORO,)	
STURDY MEMORIAL HOSPITAL,)	
INC., JAMES G. MACDONALD,)	
DOUGLAS JOHNSON, MICHAEL)	
BARTUCCA, ROBERT ASTIN,)	
and LEWIS RHEAUME,)	
Defendants)	

The plaintiff tenders the following Mandatory Disclosure materials to the defendant, pursuant to Fed. R. Civ. P. 26(a)(1):

Witnesses - Fed. R. Civ. P. 26 (a) (1) (A)

1. Ernest Ogletree, 20 Prairie Avenue, Attleboro, MA
2. James G. MacDonald, c/o Attleboro Police Department, Attleboro, MA
3. Douglas Johnson, c/o Sturdy Memorial Hospital, Inc., Attleboro, MA
4. Michael Bartucca, 57 Jacap Drive, Attleboro, MA
5. Robert Astin, 49 Augsburg Drive, Attleboro, MA
6. Lewis Rheaume, 99 Metropolitan Park, Seekonk, MA
7. Rita Ogletree-McLean, 20 Prairie Avenue, Attleboro, MA
8. Kenneth McLean, Jr., 20 Prairie Avenue, Attleboro, MA
9. Michael Fabrizio, DO, c/o Sturdy Memorial Hospital, Inc., Attleboro, MA

Witness Nos. 1-9 are expected to have information relevant

to the incident which gives rise to this action. Witness Nos. 1 and 7-9 also are expected to have information relevant to the plaintiff's damages.

The plaintiff anticipates calling additional percipient and expert witnesses, including those named in the defendant's disclosure and discovery documents, regarding the defendant's liability and the plaintiff's damages.

Relevant Documents - Fed. R. Civ. P. 26 (a) (1) (B)

1. Plaintiff's telephone bill
2. Photographs of plaintiff's damages
3. Plaintiff's medical records
4. Plaintiff's medical bills

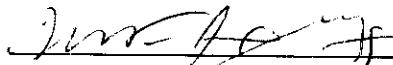
Damages Computation - Fed. R. Civ. P. 26 (a) (1) (C)

The plaintiffs' damages for pain and suffering are incapable of exact computation. The documents referenced above include information relevant to the determination of the plaintiff's special damages.

Insurance Agreement - Fed. R. Civ. P. 26 (a) (1) (D)

None.

The Plaintiff,
By his Attorney,



MARK F. LIPKOWITZ (BBO #248130)
85 Devonshire Street
Suite 1000
Boston, MA 02109-3504
(617) 227-1848
September 23, 2004

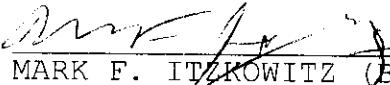
CERTIFICATE OF SERVICE

I, Mark F. Itzkowitz, counsel for the plaintiff, hereby certify that on September 23, 2004, I made service of the within document by mailing/faxing/hand-delivering a copy of same to counsel of record:

Joseph L. Tehan, Jr., Esquire
Sarah N. Turner, Esquire
Kopelman and Paige, P.C.
31 St. James Avenue
Boston, MA 02216;

Charles D. Mulcahy, Esquire
Wynn & Wynn, P.C.
90 New State Highway
Raynham, MA 02767; and

Daniel J. Buoniconti, Esquire
Foster & Eldridge
955 Massachusetts Avenue
Cambridge, MA 02139.


MARK F. ITZKOWITZ (BBO #248130)